IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA | : | CRIMINAL NO |
|--------------------------|---|-------------|
| | | |

v. : DATE FILED:_____

JAAMI ASKRA WILLIAMS JAMMEL DELONO WRIGHT : VIOLATIONS:

18 U.S.C. § 371 (conspiracy to commit

armed bank robbery - 1 count)

: 18 U.S.C. §2113(d) (armed bank robbery

- 1 count)

: 18 U.S.C. §924(c)(1) (use of a firearm during a crime of violence - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

 On or about October 17, 2006 in Philadelphia, in the Eastern District of Pennsylvania, defendants

JAMMI ASKRA WILLIAMS and JAMMEL DELONO WRIGHT

conspired and agreed, together with a person known to the grand jury, to commit an offense against the United States, that is, to knowingly and unlawfully commit an armed bank robbery of the PNC Bank, located at 330 Packer Avenue, Philadelphia, Pennsylvania (the "Bank"), the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that defendants JAMMI ASKRA WILLIAMS

and JAMMEL DELONO WRIGHT, and a person known to the grand jury, committed an armed robbery of the PNC Bank located at 330 Packer Avenue in Philadelphia, Pennsylvania, at gunpoint and stole approximately \$46,551.

OVERT ACTS

In furtherance of the conspiracy, the defendants committed the following overt acts in the Eastern District of Pennsylvania:

On or about October 17, 2006:

- 1. Defendants JAMMI ASKRA WILLIAMS and JAMMEL DELONO WRIGHT and a deceased co-conspirator, identified here as "D.H.," drove together in a silver Chevrolet Impala to an area near a PNC Bank, located at 330 Packer Avenue in Philadelphia, Pennsylvania, for the purpose of committing an armed bank robbery.
- 2. Defendant JAMMI ASKRA WILLIAMS and D.H. entered the bank, each armed with a handgun, ordered employees and customers at gunpoint into the bank's vault, and stole approximately \$46,551 from the vault and tellers' drawers.
- 3. Defendant JAMMI ASKRA WILLIAMS and D.H. fled from the bank and ran to the silver Chevrolet Impala, driven by JAMMEL DELONO WRIGHT.
- 4. Philadelphia police officers stopped the silver Chevrolet Impala and caught defendants JAMMI ASKRA WILLIAMS and JAMMEL DELONO WRIGHT after a foot chase. D.H. remained hidden in the Chevrolet Impala and opened fire on police officers when they approached, striking one officer in the face. Police officers returned fire and fatally shot D.H.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 17, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

JAMMI ASKRA WILLIAMS and JAMMEL DELONO WRIGHT

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the PNC Bank, located at 330 Packer Avenue, lawful currency of the United States, that is, approximately \$46,551 belonging to, and in the care, custody, control, management and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants WILLIAMS and WRIGHT, along with a person known to the grand jury, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of PNC Bank, and other persons, by use of dangerous weapons, that is, loaded 9mm semiautomatic Keltec and Sig Sauer .40 caliber handguns.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 17, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

JAMMI ASKRA WILLIAMS and JAMMEL DELONO WRIGHT

knowingly used and carried, and aided and abetted the use and carrying of, firearms, that is, a loaded 9mm semiautomatic Keltec handgun and a loaded Sig Sauer .40 caliber handgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, armed bank robbery in violation of Title 18, United States Code, Section 2113(d).

All in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

| | A TRUE BILL: |
|-------------------------------|-----------------------|
| | GRAND JURY FOREPERSON |
| PATRICK L. MEEHAN | |
| | |
| United States Attorney | |